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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KRISTINE REIGER, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

ST. CHARLES HEALTH SYSTEM, INC., an  
Oregon nonprofit corporation, RAY KLEIN,  
INC., a foreign corporation,

Defendants.

Case No. 6:24-cv-00334-MC

**DECLARATION OF BLYTHE H.  
CHANDLER IN SUPPORT OF  
PLAINTIFF'S RESPONSE IN  
OPPOSITION TO TO MOTION TO  
DISMISS AND MOTION FOR  
SUMMARY JUDGMENT BY  
DEFENDANT ST. CHARLES  
HEALTH SYSTEM, INC.**

I, Blythe H. Chandler, declare as follows:

1. I am a member of the law firm of Terrell Marshall Law Group PLLC and co-counsel of record for Plaintiff in this matter. I am admitted *pro hac vice* to practice before this Court. I respectfully submit this declaration in support of Plaintiff's Response to Defendants' Motion to Dismiss and Motion for Summary Judgment by Defendant St. Charles Health System, Inc. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. On April 9, 2024, I conferred with St. Charles's counsel, Misha Isaak, about the consolidated motion to dismiss and for summary judgment St. Charles intended to file that day. Mr. Isaak said the hospital's patient records refuted Kristine Reiger's allegations in her initial complaint. I told Mr. Isaak that we would be happy to review any documents that St. Charles thought definitively refuted our claims before filing a motion. Mr. Isaak said the hospital wanted to defend itself publicly against Ms. Reiger's accusations.

3. This case is in its early stages and no discovery has been taken. If the Court treats St. Charles's motion as one for summary judgment, Ms. Reiger requests the opportunity under Federal Rule of Civil Procedure 56(d) to take written discovery and depose Ms. Crowl about statements she makes in her declaration about St. Charles's policies and practices for screening patients for financial assistance and sending their unpaid charges to collection, as well as the documents she attached as exhibits. Some specific topics that Ms. Reiger believes are relevant to her response to St. Charles's arguments are (1) St. Charles's relationship with Early Out, the vendor that made collection calls to Ms. Reiger, and the nature of its business, the information it communicated and who determined what that would be; (2) St. Charles' agreements with Ray Klein and obligations it may have to disclose to Ray Klein that an account is or is not eligible financial assistance or addition of interest; (3) the content of St. Charles' referral of Ms. Rieger's account to Ray Klein; and (4) any pre-litigation analysis St. Charles did of its obligations under and compliance with ORS 646A.677.

I declare under penalty of perjury under the laws of the State of Oregon and the United States of America that the foregoing is true and correct.

EXECUTED at Seattle, Washington and DATED this 20th day of June, 2024.

By: /s/ Blythe H. Chandler  
Blythe H. Chandler (admitted *pro hac vice*)